

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

State Farm Mutual Automobile Insurance)	
Company,)	
)	
Plaintiff,)	
)	
v.)	Case No. 16-13040
)	Hon. Sean F. Cox
Elite Health Centers Inc.,)	
Elite Chiropractic, P.C.,)	
Elite Rehabilitation, Inc.,)	
Midwest Medical Associates, Inc.,)	
Pure Rehabilitation, Inc.,)	
Derek L Bittner D.C., P.C.,)	
Mark A. Radom,)	
Derek Lawrence Bittner, D.C.,)	
Ryan Matthew Lukowski, D.C.,)	
Michael P. Draplin, D.C.,)	
Noel H. Upfall, D.O.,)	
Mark J. Juska, M.D.,)	
Superior Diagnostic, Inc.,)	
Chintan Desai, M.D.,)	
Michael J. Paley, M.D.,)	
Dearborn Center for Physical Therapy, LLC,)	
Michigan Center for Physical Therapy, Inc., and)	
Jayson Rosett,)	
)	
Defendants.)	

STATE FARM MUTUAL’S FACT AND EXPERT WITNESS LIST

Pursuant to the Court’s Civil Case Management and Scheduling Order [Dkt. 81], Plaintiff State Farm Mutual Automobile Insurance Company (“State Farm Mutual”), by its attorneys, submits the following preliminary list of fact and expert witnesses (“Witness List”) it may call to testify at trial in this case. State Farm

Mutual continues its investigation and reserves its right to supplement this Witness List in accordance with Federal Rule of Civil Procedure 26(e).

Fact Witnesses:

1. Mark Radom
2. Derek Bittner
3. Jayson Rosett
4. Chintan Desai, M.D.
5. Michael Paley, M.D.
6. Noel Upfall, D.O.
7. Mark Juska, M.D.
8. Michael Draplin, D.C.
9. Ryan Lukowski, D.C.
10. Anthony Nelson
11. Diane Roberson
12. Individual patients at issue in the Complaint
13. Michael Morse
14. Ryan Bittner
15. Nicole Bittner
16. Amy Radom
17. Robert Rosett

18.Todd Franklin

19.Eliot Bank

20.Larry Garland

21.Aaron Jade

22.Ryan Weiner

23.Matthew Fishburn

24.Stig Aronsson

25.George Ingham

26.Lowell Friedman

27.Jennifer Sabo

28.Brenda Weinstock

29.Erica Cahill

30.Akilia Jackson

31.Fred Schwarze

32.Ken Jackson

33.Michael Ryan

34.Keith Soltis

35.Joshua Katke

36.Cory Mann

37.David Poces

38. Peter Grain, M.D.

39. Norman Burns, M.D.

40. Maria Ruiz, M.D.

41. Reese James, D.O.

42. Richard Jeffrey Stanley, D.C.

43. Shelby Glazer, D.C.

44. Todd Kleinstein, D.C.

45. Bernard Hughey, D.C.

46. Any employee, officer, or director of Derek L Bittner, D.C., P.C.

47. Any employee, officer, or director of Elite Chiropractic, P.C.

48. Any employee, officer, or director of Elite Health Centers, Inc.

49. Any employee, officer, or director of Elite Rehabilitation, Inc.

50. Any employee, officer, or director of Midwest Medical Associates, Inc.

51. Any employee, officer, or director Pure Rehabilitation, Inc.

52. Any employee, officer, or director of Superior Diagnostic, Inc.

53. Any employee, officer, or director of Michigan Center for Physical Therapy, Inc.

54. Any employee, officer, or member of Dearborn Center for Physical Therapy, LLC

55. Any employee, officer, or member of Horizon Imaging, LLC

56. Any employee, officer, or member of D&M Management, LLC

57.Any employee, officer, or member of Accident Information Bureau, LLC

58.Any employee, officer, or member of Accident Information Bureau of Michigan, LLC

59.Any employee, officer, or member of HI Investor, LLC

60.Any employee, officer, or member of HI Group, LLC

61.Any employee, officer, or member of 2875 Maple, LLC

62.Any employee, officer, or member of Plaintiff Investment Funding, LLC

63.Any employee, officer, or member of Plaintiff Investment Funding II, LLC – Plaintiff Investment Funding XIV, LLC

64.Any employee, officer, or member of Plaintiff Investment Funding Group, LLC

65.Any employee, officer, or member of PIF Holding Company, LLC

66.Any employee, officer, or member of Med Lien Solutions Holding Company, LLC

67.Any employee, officer, or member of Med Lien Solutions I, LLC

68.Any employee, officer, or member of 25657 Southfield Road, LLC

69.Any employee, officer, or shareholder of Michael J. Morse, P.C.

70.Any employee, officer, or member of JEL Aircraft Leasing, LLC

71.Any employee, officer, or member of 436/438 Cambourne Street, LLC

72.Records Custodian – JP Morgan Chase Bank

73.Records Custodian – Bank of America

74.Records Custodian – Comerica Bank

75.Records Custodian – Citizens Bank

76.Records Custodian – Chiropractic Federal Credit Union

77.Records Custodian – Fifth Third Bank

78.Records Custodian – PNC Bank

79.Records Custodian – Huntington National Bank

80.Any individual listed in any party's Initial Disclosures, Fact and Expert Witness Lists, and/or Expert Disclosures

81.Any individual disclosed during the course of discovery in this case

82.Any individuals referenced in any deposition, pleading, interrogatory or interrogatory response, document requests, email, correspondence, or any other document produced by any party

83.Any State Farm Mutual insured who treated at Derek L Bittner, D.C., P.C., Elite Chiropractic, P.C., Elite Health Centers, Inc., Midwest Medical Associates, Inc., Elite Rehabilitation, Inc., Pure Rehabilitation, Inc., Dearborn Center for Physical Therapy, LLC, Michigan Center for Physical Therapy, Inc., Superior Diagnostic, Inc., Horizon Imaging, LLC or for whom any Defendant¹ submitted claims, whose contact information is available on the bills submitted by Defendants to State Farm Mutual.

84.Any other doctor or medical professional who has examined or rendered services to any of the patients who were examined and/or treated by any Defendant.

85.All persons named or called to testify at trial by any Defendant.

86.All necessary rebuttal witnesses.

87.All persons necessary to authenticate or otherwise admit documentary evidence.

¹ As used in this Witness List, the term "Defendant" means any party that has appeared or may appear in this case as a defendant at any point during the pendency of this case.

Expert Witnesses:

State Farm Mutual's experts will be disclosed upon the filing of State Farm Mutual's expert disclosure.

Dated: April 18, 2018

/s/ Kathy P. Josephson

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2018, I electronically filed the foregoing with the Clerk of the Court through the CM/ECF system, which will send notices of electronic filing to all counsel of record.

/s/ Kathy P. Josephson